

**THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**This Document Relates to All Actions**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

**CERTIFICATION OF  
CLEM C. TRISCHLER**

CLEM C. TRISCHLER, being of full age, certifies as follows:

1. I am a Partner at Pietragallo Gordon Alfano Bosick & Raspanti, LLP, attorneys for Defendants Mylan Laboratories, Ltd. and Mylan Pharmaceuticals, Inc. (“Mylan”). I also am a member of the Defense Executive Committee for all Defendants in this MDL. I make this Certification based on personal knowledge and in support of the Defendants’ Joint Motion to Exclude Opinions of Ron Najafi.

2. Exhibit A, attached hereto is a true and accurate copy of the Expert Declaration of Ron Najafi, dated November 4, 2021, with Attachment A thereto, served in MDL 2875.

3. Exhibit B, attached hereto, is a true and correct copy of the condensed transcript of the deposition of Dr. Ron Najafi, taken in connection with the above-captioned matter on February 3, 2022.

4. Exhibit C, attached hereto, is a true and correct copy of the citizens petition submitted by Valisure on June 13, 2019.

5. Exhibit D, attached hereto, contains a true and correct copy of APL-MDL 2875-0105101, which was produced by Defendant Aurobindo in this litigation. This document has been filed under seal to the extent it constitutes information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

6. Exhibit E, attached hereto, is a true and correct copy of the FDA News Release, dated May 21, 2019, titled “Laboratory analysis of valsartan products.”

7. Exhibit F, attached hereto, is a true and accurate copy of the Expert Report of Michael Bottorff, Pharm. D., dated January 12, 2022 and disclosed by Defendants in this litigation pursuant to Federal Rule of Civil Procedure 26(a)(2)(B). This document has been filed with redactions to the extent it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

8. Exhibit G, attached hereto, is a true and accurate copy of the Expert Report of Eric B. Sheinin, dated January 12, 2022 and disclosed by Mylan in this litigation pursuant to Federal Rule of Civil Procedure 26(a)(2)(B). This document has been filed with redactions to the extent it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

9. Exhibit H, attached hereto, is a true and correct copy of copy of the condensed transcript of the deposition of Eric B. Sheinin, taken in connection with

the above-captioned matter on March 21, 2022. This document has been filed with redactions to the extent it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

10. Exhibit I, attached hereto, is a true and accurate copy of the letter from Attorney Nigh to Attorneys Reefer and Stoy, dated March 29, 2022. This document has been filed under seal as Plaintiffs have designated the information contained therein as “PROTECTED INFORMATION” as defined in the Protective Order.

Dated: May 3, 2022

Respectfully Submitted:

By: /s/ Clem C. Trischler  
Clem C. Trischler  
*Defense Executive Committee*

PIETRAGALLO GORDON ALFANO  
BOSICK & RASPANTI, LLP  
Clem C. Trischler,  
Jason M. Reefer  
Frank H. Stoy  
38th Floor, One Oxford Centre  
Pittsburgh, Pennsylvania 15219  
Tel: (412) 263-2000  
Fax: (412) 263-2001  
cct@pietragallo.com  
jmr@pietragallo.com  
fhs@pietragallo.com

*Counsel for Mylan  
Laboratories, Ltd. and Mylan  
Pharmaceuticals, Inc.*